

1290 WPCF-AM
Panama City Beach
Florida

March 11, 2016

Before the Federal Communications Commission
Washington, DC 20554

In the Matter of

Revitalization of the AM Radio Service

MB Docket 13-249

This is a comment regarding the NPRM# 13-249 "Revitalization of AM Radio Service". This comment is from Patrick Pfeffer, Sole Member and Managing Director of Licensee Evolution Broadcasting, LLC which owns and operates WPCF-AM, Panama City Beach, Florida.

The NPRM proposes a revision to the existing rule regarding the locating of cross service fill-in translators. The current rule requires that an FM fill-in translator for an AM station must be located such that the 60 dB μ contour of any such FM translator station must be contained within the lesser of (a) the 2 millivolts per meter (mV/m) daytime contour of the AM station, or (b) a 25-mile radius centered at the AM transmitter site.

The proposed revision in the NPRM would change that rule to require that:

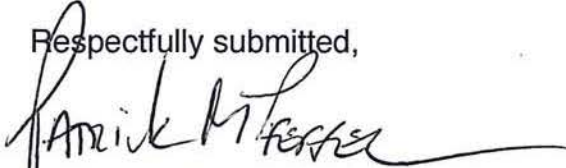
"....the coverage contour (1 mV/m) of an FM translator rebroadcasting an AM radio broadcast station as its primary station must be contained within **the greater of** either the 2 mV/m daytime contour of the AM station or a 25-mile (40 km) radius centered at the AM transmitter site, but that in no event may the translator's 1 mV/m coverage contour extend beyond a 40-mile (64 km) radius centered at the AM transmitter site."

We strongly agree with this NPRM's proposed change. Our station, like so many other low power class D stations with odd and jagged contours haven't been able to benefit much from the existing rule because of its restrictive nature and limiting language concerning an FM translator's contour in relationship to the primary station's contour. Relaxing that language and changing "the lesser of" to "**the greater of**" will allow AM stations in areas with limited tower options and/or odd shaped primary station

contours to take full advantage of the intended "revitalization" by permitting those stations' FM translators to better service their communities. This greatly furthers the public interest without impinging on or compromising anybody else's rights/interests.

I therefore humbly ask that the NPRM's proposed rule regarding this matter be in fact adopted either as written or with even more liberal language to allow AM stations more flexibility as it pertains to contour restrictions since this will bring more local programming to a greater local audience while allowing the operators to stay competitive and profitable.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Patrick M. Pfeffer", with a long horizontal flourish extending to the right.

Patrick M. Pfeffer
WPCF-AM